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ALLSTATE INSURANCE COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BAHRAM KHAMENEHPOUR,
FIROOZEH KHAMENEHPOUR

Plaintiffs,

vs.

ALLSTATE INSURANCE COMPANY
and DOES 1-50, inclusive,

Defendants.

CASE No. C06-07015 MHP

STIPULATION TO CONTINUE
DEADLINE TO COMPLETE EARLY
NEUTRAL EVALUATION

1 Pursuant to ADR L.R. 5-5 and Civ. L.R. 6-1(b), 7-1(a), and 7-11, the parties hereby
2 present this stipulated request to extend the ENE deadline in this case.

3 Good cause exists to extend the ENE deadline, currently set for June 21, 2007. An ENE
4 session was previously scheduled for June 20, 2007. However, on June 13, 2007, Michael G. W.
5 Lee, the assigned evaluator, advised the parties he would be in trial and needed to reschedule the
6 ENE. It is therefore impossible to complete the ENE prior to the current deadline.

7 All parties concur in this request. Mr. Lee similarly requests an extension of the
8 deadline.

9 The parties propose the ENE deadline be continued 90 days, until September 13, 2007,
10 so that the ENE session may be rescheduled at the convenience of all parties, their counsel, and
11 Mr. Lee.

12
13 Dated: June __, 2007

Respectfully Submitted,

SONNENSCHN NATH & ROSENTHAL LLP

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16 By _____
17 JEFFRY BUTLER

18 Attorneys for Defendant
19 ALLSTATE INSURANCE COMPANY

20 Dated: June 21, 2007

21 Respectfully Submitted,
22 BERGER LAW OFFICES

23
24 By _____
25 JEFFREY BERGER

26 Attorneys for Plaintiffs
27 BAHRAM AND FIROOZEH
28 KHAMENEHPOUR

June 22, 2007

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